

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA  
Philadelphia Division**

William Steven Stanaitis,  
Penny Mifflin Stanaitis,

*Debtors.*

Case No. 23-12187-PMM  
Chapter 13

**Motion to Reconsider**

Debtor William Steven Stanaitis and Joint Debtor Penny Mifflin Stanaitis,  
through their attorney, move this Court as follows:

1. The Court granted relief from the automatic stay to Wells Fargo Bank, N.A.  
at ECF No. 88 with respect to the Debtors' primary residence.
2. The Debtors intend to cure the arrearage that gave rise to the relief order  
before the objection deadline for this motion.

For those reasons, the Court must grant relief in the form of order attached,  
and further in the Debtors' favor if necessary and proper under the law.

Date: June 11, 2024

CIBIK LAW, P.C.  
*Attorney for Debtors*

By: 

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### Certificate of Service

I certify that on this date, I did cause a copy of this document and all attachments to be electronically served on all parties on the Clerk's service list that are registered to receive notices through the CM/ECF system. I did not serve anyone by mail.

Date: June 11, 2024



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Mike Assad